

SHER TREMONTE LLP

February 10, 2023

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Sakoya Blackwood, 22 Cr. 460 (JMF)***

Dear Judge Furman,

We represent Ms. Blackwood in the above-captioned case and write to request leave *nunc pro tunc* to file redacted documents and documents under seal in accordance with Paragraph 10 of the Court's Individual Rules and Practices for Criminal Cases, as directed by the Court's February 6, 2023 Order, ECF No. 29.

Ms. Blackwood filed her motion to dismiss and motion to suppress under seal and in redacted form in order to comply with the Protective Order so-ordered on September 9, 2022. *See* ECF No. 15. The Protective Order prohibits the public disclosure of "sensitive disclosure material," which includes "information that affects the privacy and confidentiality of individuals and entities, including sexual[ly] explicit materials that could be embarrassing to such individuals." *Id.* ¶ 2. The Protective Order also provides that "sensitive disclosure material pertinent to any motion before the Court should initially be filed under seal, absent consent of the Government or Order of the Court." *Id.* ¶ 8. The Government's designation of material as sensitive "will be controlling absent contrary order of the Court." *Id.* ¶ 2.

The proposed redactions and sealed documents all reflect information that has been marked as "sensitive" by the Government. After emailing the motions to the Court for filing under seal, counsel for Ms. Blackwood conferred with the Government to ensure that the redactions applied to the public versions were appropriate under the Protective Order. The Government agreed with the redactions.

Ms. Blackwood takes no position on whether the designation of material as "sensitive" is appropriate, or whether the proposed redactions are appropriate in light of the "right of public access" recognized by the Constitution and longstanding common-law traditions. *See United States v. Nejad*, 521 F. Supp. 3d 438, 451 (S.D.N.Y. 2021).

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We appreciate the Court's consideration.

Respectfully submitted,

/s/ Michael Tremonte  
Michael Tremonte  
Anna Estevao